

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**CEDARCRESTONE, INC.,**

**Plaintiff/Counter-Defendant,**

**v.**

**AFFILIATED COMPUTER  
SERVICES, LLC n/k/a XEROX  
BUSINESS SERVICES, LLC**

**Defendant/Counter-Plaintiff.**

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**Civil Action No. 3:12-cv-4673**

**JOINT MOTION FOR LEAVE  
FOR LIMITED EXTENSION OF CERTAIN *DAUBERT* DEADLINES**

TO THE HONORABLE COURT:

Plaintiff/Counter-Defendant CedarCrestone, Inc. (“CCI”) and Defendant/Counter-Plaintiff Affiliated Computer Services, LLC n/k/a Xerox Business Services, LLC (“Xerox”) hereby file this Joint Motion for Leave for Limited Extension of Certain *Daubert* Deadlines and in support thereof respectfully state as follows:

1. The Parties respectfully request that the Court modify its Scheduling Order for a limited extension of the deadline for filing *Daubert* motions – as it relates to CCI’s expert Mr. Turner and Xerox’s expert Mr. Trivett – from June 16, 2014 to **August 14, 2014**. There is good cause for this requested modification of the Scheduling Order, as explained below.

2. CCI requests this additional time because both experts have scheduling conflicts that will prevent the Parties from completing the depositions of Mr. Turner and Mr. Trivett prior to the current *Daubert* deadline. In an attempt to comply with spirit of the Court’s instruction that the Parties seek to resolve matters amicably, Xerox does not oppose the relief requested in this motion and joins it.

3. In order to allow the parties to complete Mr. Turner and Mr. Trivett's expert depositions prior to the need for filing any *Daubert* motions, the parties request that the Court extend the *Daubert* deadline (only as it relates to these two experts) until August 14, 2014 (so that *Daubert* Motions will not be due until after the completion of Mr. Turner and Mr. Trivett's depositions). The *Daubert* deadline for all other experts will remain June 16, 2014.

4. The Parties submit there is good cause for this requested modification to the Scheduling Order. The Parties have been diligent in scheduling but need a small amount of additional time. The modification requested herein will not affect the current trial date.

WHEREFORE, The Parties jointly move this Court to extend the deadline to file *Daubert* Motions as it relates to Mr. Turner and Mr. Trivett, and that the Court award all other just relief.

Dated June 12, 2014

Respectfully submitted,

/s/ Christine A. Nowak

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**ATTORNEYS FOR AFFILIATED COMPUTER  
SERVICES, LLC, n/k/a XEROX BUSINESS  
SERVICES, LLC**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on June 12, 2014. Any other counsel of record will be served by First Class U.S. Mail on this same date.

/s/ Christine A. Nowak

Christine A. Nowak

**CERTIFICATE OF CONFERENCE**

I certify that on June 10, 2014, counsel for CCI, conferred with counsel for Xerox, and the Parties jointly move for the relief requested herein.

/s/ Christine A. Nowak

Christine A. Nowak

